

4. Plaintiffs commenced a civil action in the Superior Court of New Jersey for Middlesex County, on or about March 12, 2020.

5. It is believed that the Complaint was served on moving defendant on August 27, 2020.

6. An Answer was served and filed on behalf of defendants J.B. Hunt and Kenneth Diaz on November 4, 2020 in Middlesex County Superior Court.

7. On February 28, 2021 attorney for plaintiff emailed the undersigned and made a global settlement demand of \$5,000,000. See **“Exhibit B”**.

9. There are no other known defendants in this matter.

10. A review of plaintiffs’ Complaint reveals that plaintiff, Jessika Cintron, allegedly sustained severe personal injuries.

11. Based on the fair reading of plaintiff’s settlement demand and alleged injuries, plaintiffs have set forth a claim in which the amount is in the excess of jurisdictional limits of \$75,000.00, exclusive of interest and costs which may be at stake.

12. Diversity of citizenship within the meaning of 28 U.S.C. §1332 exists between plaintiffs and defendant since: (a) plaintiff is a citizen, resident and reside in the state of New Jersey and defendant J.B. Hunt Transport, Inc. is incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

13. Furthermore, diversity of citizenship existed at the time the action sought to be removed was commenced and continues through the time of filing of this notice such that moving defendants are entitled to removal pursuant to 28 U.S.C. §1441, as amended and 28 U.S.C. §1446.

WHEREFORE, J.B. Hunt Transport, Inc. s/h/a J&B Hunt and Kenneth Diaz claim that the above-captioned action now pending in the Superior Court of New Jersey, Law Division, Middlesex County, be removed therefrom to this Honorable Court.

Dated: March 24, 2021

RAWLE & HENDERSON LLP



By: _____

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